

Filed in open court 4/18/05 (EW)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT RAMSEUR,

Defendant.

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Criminal Complaint No. 05- 75 M

CR 05-42-JTF

**MOTION FOR DETENTION HEARING**

NOW COMES the United States and moves for the pretrial detention of the defendant, ROBERT RAMSEUR, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☒ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community

3. **Rebuttable Presumption.** The United States **will** invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because **(check one or both):**

  X   Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

       Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

       At first appearance

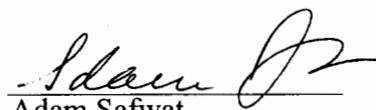
  X   After continuance of   3   days (not more than 3).

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

Date: April 18, 2005

BY:

  
Adam Safwat  
Assistant United States Attorney